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Attorneys for Attorneys for Federal Defendants
and Defendant United States of America.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

CASE NO. 4:23-CV-04155-YGR

Plaintiffs
v.

DECLARATION OF MADISON MATTIOLI

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

Defendants.

I, MADISON MATTIOLI, declare as follows:

1. My name is Madison Mattioli, and I am an attorney of record in the above captioned case representing Federal Defendants and Defendant United States of America.
2. After the motions hearing on February 27, 2024, the Court instructed counsel for the United States to file information regarding the process of relaying sexual assault allegations between the Bureau of Prisons' (BOP) Office of Internal Affairs, the BOP's local institutions, and the Department of Justice's Office of the Inspector General, and to address a specific sexual misconduct allegation raised by Plaintiffs' counsel.
3. The Court advised counsel that this information could be filed under seal.
4. Thus, based on this statement, counsel for the United States requests to file the requested documents containing the information under seal.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed this 7th day of March, 2024, at Helena, MT.

/s/ Madison L. Mattioli
MADISON MATTIOLI
Assistant United States Attorney
District of Montana